

Dan Levy

From: Dan Levy
Sent: Wednesday, May 28, 2008 10:21 AM
To: 'Amy Davis'
Cc: 'pbrown@bakerlaw.com'; Ron Paltrowitz; 'mcarvalho@bakerlaw.com'; John Bostany; 'Anthony H. Lowenberg'; Dan Levy
Subject: RE: ePartners discovery responses

We continue to await a date and time to meet and confer prior to preparing a motion on these latest discovery issues.

As a reminder, I believe that we have already sent email correspondence on approximately 6 occasions and left voicemail messages inquiring about several significant discovery issues that are still pending. To date, we have not received meaningful responses regarding any of these issues.

Are you available today at 4pm or tomorrow at 10am (Eastern Time) for a meet and confer?

Your prompt attention to this matter is greatly appreciated.

Thanks,

Dan Levy

From: John Bostany
Sent: Saturday, May 24, 2008 9:34 AM
To: 'Amy Davis'; 'Anthony H. Lowenberg'
Cc: 'pbrown@bakerlaw.com'; Ron Paltrowitz; 'mcarvalho@bakerlaw.com'; Dan Levy
Subject: ePartners discovery responses

Amy, Peter, Anthony and Melissa

Please provide a date and time that any of you can meet and confer with us about this issue as well as the issue concerning the documents responsive to our first requests that you continue to withhold. Dan attempted to meet and confer with several of you yesterday but was unsuccessful.

Thanks

John

From: Dan Levy
Sent: Friday, May 23, 2008 11:19 AM
To: 'Amy Davis'; 'Anthony H. Lowenberg'
Cc: John Bostany; 'pbrown@bakerlaw.com'; Ron Paltrowitz; 'mcarvalho@bakerlaw.com'; John Bostany; Dan Levy
Subject: RE: GMA's responses to ePartners' discovery requests

We still have not received a response regarding our discovery requests.

Thanks,

Dan Levy

From: Ron Paltrowitz
Sent: Thursday, May 22, 2008 8:14 AM
To: Amy Davis; Anthony H. Lowenberg; pbrown@bakerlaw.com; mcarvalho@bakerlaw.com
Cc: John Bostany; Dan Levy
Subject: FW: GMA's responses to eParterns' discovery requests

Amy Anthony Peter, Melissa:

We did not receive a reply to Mr. Levy's email below. Please call me to discuss your delinquent responses to our Second Requests for Documents and Answers to Interrogatories. I'd prefer not to bother Judge Kaplan with a motion unless this is absolutely necessary.

Thank you.

Ronald I. Paltrowitz, Esq.
Of Counsel
The Bostany Law Firm
40 Wall Street, 61st Floor
New York, NY 10005
(212) 530 4411 (phone)
(212) 530 4488 (fax)

From: Dan Levy
Sent: Wednesday, May 21, 2008 11:43 AM
To: 'Amy Davis'
Cc: 'Anthony H. Lowenberg'; 'pbrown@bakerlaw.com'; 'mcarvalho@bakerlaw.com'; John Bostany; Ron Paltrowitz; Dan Levy
Subject: RE: GMA's responses to eParterns' discovery requests

Amy:

We have not yet received ePartners' responses to GMA's Second Requests for Documents and Second Set of Interrogatories. As these requests were sent on March 20, ePartners' responses are very late.

I appreciate your prompt attention to this matter.

Thanks,

Dan Levy